## UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF MISSISSIPPI

IN RE: Cynithia Harrell Gunn

Chapter 13

Case No.: 17-12395

### OBJECTION TO SECURED CLAIM AND OTHER RELIEF

COME NOW, Debtor(s) Cynithia Harrell Gunn, by and through counsel, and file this objection to the following pre-petition secured claim and request the Court to set the value for the purpose of plan confirmation:

CREDITOR: United Consumer

Description of collateral: vacuum

Amount of Debt: \$866.00 the amount alleged to be due.

Treatment: Pay the value of \$500.00 plus interest of 5 %, and upon payment of same, eliminate any lien.

DEBTOR(S) pray(s) that upon payment as stated above, the lien be cancelled and my title documents be delivered to the Debtor(s).

DATED: June 28, 2017.

Respectfully submitted,

/s/ Heidi S. Milam Heidi S. Milam P.O. Box 1169 Southaven, MS 38671 662-349-2322

# UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF MISSISSIPPI

IN RE: Cynithia Harrell Gunn Chapter 13

Case No.: 17-12395

### NOTICE OF OBJECTION TO SECURED CLAIM

YOU ARE HEREBY NOTIFIED that a written response to the attached objection to secured claim, etc., must be filed with:

Clerk of Court U.S. Bankruptcy Court Northern District of Mississippi 703 Hwy 145 North Aberdeen, MS 39730

and a copy must be served on the undersigned Debtor(s)' attorney and the Chapter 13 trustee on or before thirty (30) days from the date of this notice, or the Court may enter a Confirmation Order, which shall set the value of each affected secured creditor's lien, and which shall sustain the objection to secured claim, etc., granting the relief requested therein. In the event a written response is filed, the court will notify you of the date, time and place of the hearing thereon.

DATED: June 28, 2017.

Locke D. Barley sbeasley@barkley13.com

U.S. Trustee USTPRegion05.AB.ECF@usdoj.gov

/s/ Heidi S. Milam ATTORNEY FOR DEBTOR(S) P.O. Box 1169 Southaven, MS 38671 662-349-2322

United Consumer 865 Bassett Rd. Westlake, OH 44145

### **CERTIFICATE OF SERVICE**

I, Heidi S. Milam, do hereby certify that I have this day served in the manner set out below, a true and accurate copy of the foregoing Objection To Secured Claim and Other Relief along with the Notice of Objection To Secured Claim to the following:

Locke D. Barley <a href="mailto:sbeasdley@barkley13.con">sbeasdley@barkley13.con</a>

U.S. Trustee <u>USTPRegion05.AB.ECF@usdoj.gov</u>

United Consumer 865 Bassett Rd. Westlake, OH 44145

This the 28<sup>th</sup> day of June, 2017.

/s/ Heidi S. Milam Heidi S. Milam